

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION**

No. 1:21-md-3010 (PKC)

This Document Relates To:

**IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION**

No. 1:21-cv-7001 (PKC)

**MICHAEL STELLMAN, individually and on
behalf of all others similarly situated**

Plaintiff,

- against -

GOOGLE LLC ET AL.,

Defendants.

No. 1:23-cv-01532 (PKC)

**DEFENDANTS GOOGLE LLC AND ALPHABET INC.'S NOTICE OF RENEWED
MOTION TO COMPEL ARBITRATION AND STAY PROCEEDINGS AS TO
PLAINTIFFS CLIFFY CARE LANDSCAPING LLC AND MICHAEL STELLMAN**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Google LLC and Alphabet Inc.'s Renewed Motion to Compel Arbitration and Stay Proceedings as to Plaintiffs Cliffy Care Landscaping LLC and Michael Stellman in the above-captioned matters and Declaration of Armete Mobin dated June 24, 2024 and accompanying exhibits, which are being submitted contemporaneously with this Notice of Motion, Defendants Google LLC and Alphabet Inc., will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order pursuant to Section 3 of the Federal Arbitration Act, compelling arbitration and staying proceedings as to Advertiser Plaintiffs Cliffy Care Landscaping LLC and Michael Stellman. Google files its motion without prejudice to a later motion for summary judgment on the merits, should this Court deny its motion to compel arbitration.

Dated: October 18, 2024

/s/ Justina Sessions

Justina K. Sessions
FRESHFIELDS US LLP
855 Main Street
Redwood City, CA 94063
Telephone: (650) 618-9250
justina.sessions@freshfields.com

Eric Mahr
700 13th Street NW, 10th Floor
Washington, DC 20005
Telephone: (202) 777-4500
Facsimile: (202) 777-4555
eric.mahr@freshfields.com

*Counsel for Defendants Google LLC and
Alphabet Inc.*